



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 15, 2001

Alec Poitevint, Treasurer
Republican National Committee - RNC
310 First Street, SE
Washington, DC 20003

Identification Number: C00003418

Reference: August Monthly Report (7/1/00-7/31/00)

Dear Mr. Poitevint:

This letter is to inform you that as of February 14, 2001, the Commission has not received your response to our request for additional information, dated January 10, 2001. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by March 7, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Dominick Ciaraldi on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", followed by a horizontal line.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alec Poitevint, Treasurer
Republican National Committee - RNC
310 First Street S.E.
Washington, DC 20003

JAN 10 2001

Identification Number: C00003418

Reference: August Monthly Report (7/01/00-7/31/00)

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for "Media Buy" and "Ad Cost" on Schedules H4 and B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): "Consulting", "Consulting Costs" and "Events". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H4 of your report discloses a disbursement to the Fairmont Park Commission for a charitable donation. Please be advised that a charitable donation does not qualify as shared expense to be allocated between your federal and non-federal accounts. Federal operating expenses should be disclosed on a Schedule B supporting Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for this disbursement(s) is not permissible and should be transferred-out immediately. 11 CFR §102.5(a)(1)(i) Please amend your report to clarify the disbursement(s).

-Schedule H4 of your report discloses voided checks for shared expenditures made during previous reporting periods (pertinent portions attached). Please clarify if and when the voided checks disclosed on Schedule H4 were reissued. If these checks were not reissued, please clarify the steps your committee has taken to account for the federal portion of these voided checks.

Moreover, Schedule H3 discloses negative transactions which attempt to compensate for the previous transfer-in of the non-federal portion of these subsequently voided checks, thus reducing the amount of your committee's non-federal transfer for this reporting period. In the future, please note that when a committee voids a check for a payment of a shared activity, the non-federal portion of the payment must be transferred back to the non-federal account and reported on Schedule B supporting Line 22.

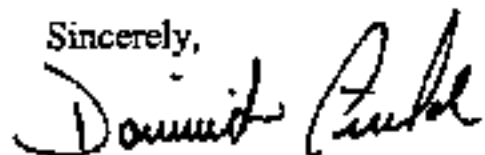
-Schedule H4 discloses a disbursement for E5 which is categorized as fundraising; however, Schedule H2 does not include an allocation ratio for this activity. Please amend Schedule H2 to disclose the omitted ratio.

-The disclosure of some administrative expenses on Schedule H4 appear to be 100% non-federal activities. 11 CFR §106.5(g) states that a committee shall pay the entire amount of an allocable expense from its federal account and shall transfer funds from its non-federal account solely to cover the non-federal share of that allocable expense. The Administrative/Voter Drive activity disclosed on your report as 100% non-federal does not represent payments for allocable expenses of joint federal and non-federal activities. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dominick Ciaraldi". The signature is fluid and cursive, with a large initial "D" and a stylized "C".

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

DISBURSEMENT SCHEDULE H4
 RUN DATE: 08/14/00

REPUBLICAN NATIONAL COMMITTEE
 JOINT FEDERAL/NON FEDERAL
 ACTIVITY SCHEDULE

PAGE: 322
 FOR LINE 218

RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
EST MARKETING ASSOC., INC. 212 CORPORATE PARK ROAD FOREST VA 24551	DATE: 07/19/00 PURPOSE: POSTAGE CATEGORY: FUNDRAISING EVENT: M7 EVENT \$YTD: \$21,639.11	433.62	303.53	130.09
COSTAR LLC/BUDDAKON 134 MARKET ST PHILADELPHIA PA 19106	DATE: 07/07/00 PURPOSE: VOID#85014 5/01/00 CATEGORY: FUNDRAISING EVENT: P5 EVENT \$YTD: \$52,075.97	-10,000.00	-1,000.00	-9,000.00
COSTAR LLC/BUDDAKON 134 MARKET ST PHILADELPHIA PA 19106	DATE: 07/06/00 PURPOSE: VOID#85069 5/16/00 CATEGORY: FUNDRAISING EVENT: P5 EVENT \$YTD: \$52,075.97	-17,000.00	-1,700.00	-15,300.00
CAPITOL HILL CLUB 300 FIRST ST., SE WASHINGTON DC 20003	DATE: 07/19/00 PURPOSE: MEALS CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	1,266.44	88.65	1,177.79
PRTY CASH FUND RNC 310 FIRST ST., SE WASHINGTON DC 20003	DATE: 07/07/00 PURPOSE: MEETINGS CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	8.07	.56	7.51
PRTY CASH FUND RNC 310 FIRST ST., SE WASHINGTON DC 20003	DATE: 07/07/00 PURPOSE: TAXI CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	8.00	.56	7.44
OLIVES 1600 K ST NW WASHINGTON DC 20006	DATE: 07/11/00 PURPOSE: CATERING CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	9,230.59	646.14	8,584.45
PAGE TOTAL		-16,053.28	-1,660.55	-14,392.73

DISBURSEMENT SCHEDULE B4
RUN DATE: 08/14/:0

REPUBLICAN NATIONAL COMMITTEE
JOINT FEDERAL/NON FEDERAL
ACTIVITY SCHEDULE

PAGE: 323
FOR LINE 21a

RECIPIENT

PURPOSE OF EXPENDITURE

TOTAL

FEDERAL

NON-FEDERAL

STEVE PEARSON
1709-1/2 21ST ST., NW
APT. 24
WASHINGTON DC 20009

DATE: 07/06/00
PURPOSE: VOID#84983 4/25/00
CATEGORY: FUNDRAISING
EVENT: P4 EVENT \$YTD:

-3,000.00

-300.00

-3,700.00

STEVEN PEARSON
1817 N. OAKLAND ST.
ARLINGTON VA 22207

DATE: 07/28/00
PURPOSE: MEALS
CATEGORY: FUNDRAISING
EVENT: P7 EVENT \$YTD:

57.18

4.00

53.18

STEVE PEARSON
1709 1/2 21ST ST NW
APT 24
WASHINGTON, DC 20009

DATE: 07/28/00
PURPOSE: MEALS
CATEGORY: FUNDRAISING
EVENT: P7 EVENT \$YTD:

26.24

1.84

24.40

REFLECTIONS PHOTOGRAPHY, INC.
6408-P SEVEN CORNERS PL.
FALLS CHURCH VA 22044

DATE: 07/24/00
PURPOSE: PHOTOGRAPHY COST
CATEGORY: FUNDRAISING
EVENT: P7 EVENT \$YTD:

350.00

24.50

325.50

TOURNAMENT PLAYERS CLUB
AT AVENUE
10000 OAKLYN DR.
POTOMAC MD 20854

DATE: 07/07/00
PURPOSE: GOLF TOURNAMENT
CATEGORY: FUNDRAISING
EVENT: P7 EVENT \$YTD:

28,089.59

1,966.27

26,123.32

APOLLO EXPRESS COURIER
140 LITTLE FALLS ST.
SUITE 111
FALLS CHURCH VA 22046

DATE: 07/28/00
PURPOSE: DELIVERY COST
CATEGORY: FUNDRAISING
EVENT: S7 EVENT \$YTD:

8.46

.59

7.87

BALFOUR PHOTOGRAPHY
2481 MISSION ST.
SAN MARINO CA 91108

DATE: 07/07/00
PURPOSE: PHOTO SHOOTING FEE
CATEGORY: FUNDRAISING
EVENT: S7 EVENT \$YTD:

370.00

25.90

344.10

PAGE TOTAL

25,901.47

1,723.10

24,178.37

